

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

SEP 29 2006

Mr. Tim Woods, Gin Manager
D G & G Inc.
PO Box 696
Sikeston, MO 63801

Re: D G & G Inc., 207-0048
Permit Number: **OP2006-071**

Dear Mr. Woods:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

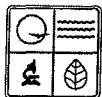
Kyra L Moore

for Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:S

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII
Ms. Amy Baker, Southeast Regional Office
PAMS File: 2002-08-121



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: **OP2006-071**
Expiration Date: SEP 28 2011
Installation ID: 207-0048
Project Number: 2002-08-121

Installation Name and Address

D G & G Inc.
7055 State Highway 153
Parma, MO 63870
Stoddard County

Parent Company's Name and Address

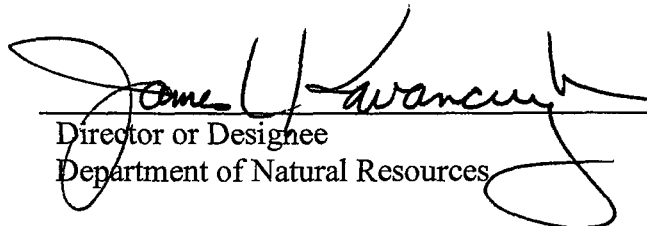
D G & G Inc.
PO Box 696
Sikeston, MO 63801

Installation Description:

This installation is a cotton ginning operation. It processes harvested cotton which has been stored in the fields in modules and then trucked to this installation. It removes moisture, pods, seeds, sticks and other debris, and then bales the cleaned cotton. It also cleans and bales "motes", the undeveloped and partially developed seeds with attached short fibers.

SEP 29 2006

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

This installation is a cotton ginning operation. It processes harvested cotton which has been stored in the fields in modules and then trucked to this installation. It removes moisture, pods, seeds, sticks and other debris, and then bales the cleaned cotton. It also cleans and bales "motes", the undeveloped and partially developed seeds with attached short fibers.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	20.55 *	0.00 *	0.39	0.01	0.05	0.00	0.00
2004	21.44	0.00	0.57	0.02	0.08	0.00	0.00
2003	19.42	0.00	0.73	0.03	0.10	0.00	0.00
2002	19.24	0.00	0.80	0.03	0.11	0.00	0.00
2001	17.46	0.00	0.62	0.02	0.08	0.00	0.00

* These figures were corrected during processing of the 2005 Emission Inventory Questionnaire.

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>	<u>EIQ EP#</u>
EU0010	Cotton Gin, "Total No. 2", Except Dryers	EP1
EU0020	Dryers	EP2
EU0030	Burner	None
EU0040	Cyclone Robber System	EP9 and EP10
EU0050	Mote Trash Fan	EP5

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment which does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

None

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit:

- 1) Construction Permit 0897-016, issued August 4, 1997, and
- 2) Construction Permit 0398-009, issued February 25, 1998.

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 99.5 tons of particulate matter with an aerometric diameter less than or equal to 10 microns (PM₁₀) from the entire installation in any consecutive 12-month period.

Production Limitation:

The permittee shall produce no more than 60,000 bales of cotton in any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall keep a record of the number of bales of cotton produced each month, and a record of the number of bales of cotton produced in each rolling 12-month period.
- 2) Attachment A contains a form satisfying these recordkeeping requirements. This form, or an equivalent created by the permittee, must be used to certify compliance with these requirements.
- 3) When in compliance with the Production Limitation of this permit condition, the permittee will also be in compliance with its Emission Limitation. Calculations demonstrating this are in Attachment B. The permittee shall keep this attachment with the rest of this permit.
- 4) The permittee shall maintain these records for the most recent five years. They must be maintained on-site for two years. They may be kept in either written or electronic form.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon verbal request and presentation of identification.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of any month in which the production limitation of this permit condition is exceeded.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 – COTTON GIN, “TOTAL NO. 2”, EXCEPT DRYERS		
Emission Unit	Description	2001-EIQ Reference #
EU0010	Cotton Gin, “Total No. 2”, Except Dryers (“Total No. 2” is defined in U.S. EPA document AP-42, <i>Compilation of Air Pollutant Emission Factors</i> ; Volume I, Stationary Point and Area Sources, Fifth Edition just before Table 9.7-1.) Units in the cotton ginning process before the gin stands emit air at high pressure and are controlled by cyclones; those after the gin stands emit air at low pressure and are controlled by screens.	EP1

PERMIT CONDITION EU0010-001

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with opacity greater than 20%.
New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on this emission unit (EU0010) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) If the Department of Natural Resources inspects the installation during a monitoring period, this inspection may be substituted for an observation by the permittee.
- 3) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. No weekly observation is required during a week when the emission unit was not operating. Should no violation of this regulation be observed during this period then-

- b) Observations must be made once every two weeks for a period of eight weeks. No biweekly observation is required during a two-week period when the emission unit was not operating. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
- c) Observations must be made semi-annually. No semi-annual observation is required during a half-year when the emission unit was not operating. If a violation is noted, monitoring reverts to weekly.

If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source is already in compliance with this regulation under a previous permit, the weekly and biweekly monitoring do not need to be done.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (See Attachment C1 or C2.), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) A Department of Natural Resources inspection report may be substituted for an observation result recorded on Attachment C1 or C2.
- 3) The permittee shall maintain records of any equipment malfunctions which result in visible air emissions. (See Attachment D.)
- 4) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment E.)
- 5) Attachments C1, C2, D and E contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement. Department of Natural Resources inspection reports may also be used.
- 6) All records shall be maintained for five years. They shall be kept onsite for at least two years. They may be kept in either hard-copy form or on computer media.
- 7) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually, in the annual monitoring report and annual compliance certification, as required by Section V of this permit.

EU0020 AND EU0030 – DRYERS AND BURNER			
Emission Unit	Description	Manufacturer/Model #	2001 EIO Reference #
EU0020	Dryers. There are two of these in the cotton ginning process.	Unknown	EP2
EU0030	Burner, 3.5 MMBt/hr. This is an extra dryer which is occasionally used when the cotton modules are very wet. It is between the module feeder and the feed control unit to the first regular dryer.	Continental	None

PERMIT CONDITION (EU0020 AND EU0030)-001
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with opacity greater than 20%.
New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on these emission units (EU0020 and EU0030) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission units are operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) If the Department of Natural Resources inspects the installation during a monitoring period, this inspection may be substituted for an observation by the permittee.
- 3) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. No weekly observation is required during a week when the emission units were not operating. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two weeks for a period of eight weeks. No biweekly observation is required during a two-week period when the emission units were not operating. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made semi-annually. No semi-annual observation is required during a half-year when the emission units were not operating. If a violation is noted, monitoring reverts to weekly.

If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source is already in compliance with this regulation under a previous permit, the weekly and biweekly monitoring do not need to be done.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (See Attachment C1 or C2.), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) A Department of Natural Resources inspection report may be substituted for an observation result recorded on Attachment C1 or C2.
- 3) The permittee shall maintain records of any equipment malfunctions which result in visible air emissions. (See Attachment D.)
- 4) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment E.)
- 5) Attachments C1, C2, D and E contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement. Department of Natural Resources inspection reports may also be used.
- 6) All records shall be maintained for five years. They shall be kept onsite for at least two years. They may be kept in either hard-copy form or on computer media.
- 7) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually, in the annual monitoring report and annual compliance certification, as required by Section V of this permit.

<p align="center">PERMIT CONDITION (EU0020 AND EU0030)-002 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds</p>
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Emission Limitation:

- 1) Emissions from any existing or new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) Stack gases shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation/Equipment Specifications:

The Dryers (EU0020) and Burner (EU0030) shall be limited to burning pipeline grade natural gas, liquefied petroleum gas, or any combination of these fuels.

Monitoring/Recordkeeping/Reporting:

- 1) The permittee will be in compliance with this regulation as long as these emission units burn pipeline grade natural gas, liquefied petroleum gas, or any combination of these fuels.
- 2) The permittee shall maintain documentation that demonstrates that the fuel used in these emission units is pipeline grade natural gas, liquefied petroleum gas, or a combination of these fuels. No additional monitoring, recordkeeping, or reporting is required for this permit condition.

Note: The current version of 10 CSR 10-6.260 (May 30, 2004, effective date) exempts combustion equipment that exclusively uses pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, from the requirements of this rule. Therefore, when the provisions of the current version of 10 CSR 10-6.260 are incorporated into the federally approved SIP as a final EPA action, the emission units will not be subject to 10 CSR 10-6.260 and this permit condition will no longer be an applicable requirement in this operating permit.

EU0040 AND EU0050 – CYCLONE ROBBER SYSTEM AND MOTE TRASH FAN			
Emission Unit	Description	Manufacturer/Model #	2001 EIQ Reference #
EU0040	Cyclone Robber System, cyclones C09 and C10, which control cyclones C01 through C06	Unknown	EP9 and EP10
EU0050	Mote Trash Fan, fan which moves air from mote incline cleaner to cyclone C05	Unknown	EP5

PERMIT CONDITION (EU0040 AND EU0050)-001
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with opacity greater than 20%.
New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on these emission units (EU0040 and EU0050) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission units are operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) If the Department of Natural Resources inspects the installation during a monitoring period, this inspection may be substituted for an observation by the permittee.
- 3) The following monitoring schedule must be maintained:

- a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. No weekly observation is required during a week when the emission units were not operating. Should no violation of this regulation be observed during this period then-
- b) Observations must be made once every two weeks for a period of eight weeks. No biweekly observation is required during a two-week period when the emission units were not operating. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
- c) Observations must be made semi-annually. No semi-annual observation is required during a half-year when the emission units were not operating. If a violation is noted, monitoring reverts to weekly.

If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source is already in compliance with this regulation under a previous permit, the weekly and biweekly monitoring do not need to be done.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (See Attachment C1 or C2.), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) A Department of Natural Resources inspection report may be substituted for an observation result recorded on Attachment C1 or C2.
- 3) The permittee shall maintain records of any equipment malfunctions which result in visible air emissions. (See Attachment D.)
- 4) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment E.)
- 5) Attachments C1, C2, D and E contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement. Department of Natural Resources inspection reports may also be used.
- 6) All records shall be maintained for five years. They shall be kept onsite for at least two years. They may be kept in either hard-copy form or on computer media.
- 7) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually, in the annual monitoring report and annual compliance certification, as required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-3.030 Open Burning Restrictions
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- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt D G & G Inc. from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage
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- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B, and §(6)(C)3.D, and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Mark Robinson. The Air Pollution Control Program has been informed that Tim Woods, Gin Manager, is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to

be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

ATTACHMENT A
Tracking Record of Bales Produced

For month of _____, year of _____¹

Company Name: D G & G Inc

Facility Location: 7055 State Highway 153, Parma, MO 63870

Stoddard County

Facility ID: 207-0048

_____ Total Bales Produced This Month

_____ Running 12-Month Total Bales Produced²

1 Duplicate and fill out this form each month

2 Sum "Total Bales Produced This Month" for this Attachment A and the Attachment A's for the previous eleven months to obtain "Running 12-Month Total Bales Produced." Or add "Total Bales Produced This Month" to the "Running 12-Month-Total Bales Produced" for last month and then subtract "Total Bales Produced This Month" for the same month last year . The result should be the same either way.

If "Running 12-Month Total Bales Produced" is not more than 60,000, then the installation is in compliance with Permit Condition PW001.

ATTACHMENT B
Compliance Demonstration for Permit Condition PW001

Company Name: D G & G Inc
Facility Location: 7055 State Highway 153, Parma, MO 63870 Stoddard County Facility ID: 207-0048

The following calculations demonstrate that if the installation does not produce more than 60,000 bales per year, then it will emit less than 99.5 tons per year of PM₁₀, and will be in compliance with Permit Condition PW001.

All emission factors used in these calculations are from Table 9.7-1 in U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

The emission factor for PM₁₀ for a cotton gin with cyclones on high pressure air and screens on low pressure air ("Total No. 2") is 1.2 lb/bale. This includes the emissions from the two dryers, but not from the burner, the cyclone robber system, or the mote trash fan.

$$\text{CottonGin, "TotalNo2" PM}_{10}\text{PTE} = \left(\frac{60,000 \text{ bales}}{\text{yr}} \right) \left(\frac{1.2 \text{ lb}}{\text{bale}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 36.0 \text{ tons / yr}$$

The burner is an extra dryer, used only when the cotton modules are unusually wet. Sometimes it is not used at all during a ginning season. It provides an extra drying step between the module feeder and the first dryer when that is necessary, which is seldom. It will have the same emission factor for PM₁₀ as the first dryer, 0.12 lb/bale.

$$\text{Burner PM}_{10}\text{PTE} = \left(\frac{60,000 \text{ bales}}{\text{yr}} \right) \left(\frac{0.12 \text{ lb}}{\text{bale}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 3.6 \text{ tons / yr}$$

The emission factor for PM₁₀ for the cyclone robber system is 0.052 lb/bale.

$$\text{CycloneRobberSystem PM}_{10}\text{PTE} = \left(\frac{60,000 \text{ bales}}{\text{yr}} \right) \left(\frac{0.052 \text{ lb}}{\text{bale}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 1.6 \text{ tons / yr}$$

The emission factor for PM₁₀ for the mote trash fan is 0.021 lb/bale.

$$\text{MoteTrashFan PM}_{10}\text{PTE} = \left(\frac{60,000 \text{ bales}}{\text{yr}} \right) \left(\frac{0.021 \text{ lb}}{\text{bale}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 0.6 \text{ ton / yr}$$

$$\text{Total PM}_{10} \text{ PTE} = 36.0 \text{ tons/yr} + 3.6 \text{ tons/yr} + 1.6 \text{ tons/yr} + 0.6 \text{ ton/yr} = 41.8 \text{ tons/yr} < 99.5 \text{ tons/yr}$$

ATTACHMENT C1

Method 22 (Outdoor Observation Log)		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
<p>Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.</p>		
Observation Clock Time	Observation Period Duration (minute:second)	Accumulative Emission Time (minute:second)
Begin Observation		
End Observation		

ATTACHMENT C2

[illegible]

ATTACHMENT D

[illegible]

ATTACHMENT E

Method 9 Opacity Emission Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Min.	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____

YES NO Signature of Observer

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received August 21, 2002
- 2) 2005 Emissions Inventory Questionnaire, received March 28, 2006
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

The general operating permit application did not indicate that the installation was subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

- 1) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*, is included in this operating permit because the operation has combustion sources – the Dryers EU0020 and Burner (EU0030).

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

- 1) 10 CSR 10-3.060, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*, does not apply to this installation. The Dryers (EU0020) and Burner (EU0030) are direct-fired.
- 2) 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminants*, does not apply to this installation, because it was rescinded on May30, 2000. It was replaced by 10 CSR 10-6-220, *Restriction of Emission of Visible Air Contaminants*, which is included in this permit.
- 3) 10 CSR 10-6.100, *Alternate Emission Limits*, does not apply to this installation. Per 10 CSR 10-6.100(1)(A), it is exempt because it is in an ozone attainment area.
- 4) 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* does not apply to this installation because, per §(1)(A)1 of that regulation, cotton gins are exempt.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

- 1) Construction Permit 0897-016, issued August 4, 1997
 - a) This construction permit applies PM emission limits based on 10 CSR 10-3.060, *Restriction of Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*, to the Burner (EU0030). This regulation does not apply to the burner because it is direct-fired. Since the construction permit showed that the burner was always in compliance and required no monitoring, recordkeeping, or reporting, this does not represent any change in practice.
 - b) This construction permit also references 10 CSR 10-3.080 *Restriction of Emission of Visible Air Contaminants*. This regulation was rescinded on May 30, 2000, and is therefore not included in this operating permit. It was replaced by 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, which is included in this permit.
- 2) Construction Permit 0398-009, issued February 28, 1998
 - a) This construction permit applies PM emission limits based on 10 CSR 10-3.050, *Restriction of Emission of Particulate Matter From Industrial Processes*, to the mote incline cleaner and press. This regulation was rescinded on March 30, 2001, and is therefore not included in this operating permit. It was replaced by 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, which was not included in this permit either. (See "Other Air Regulations Determined Not to Apply to the Operating Permit" above.) Since the construction permit showed that the mote incline cleaner and press were always in compliance and required no monitoring, recordkeeping, or reporting, this does not represent any change in practice.
 - b) This construction permit also references 10 CSR 10-3.080 *Restriction of Emission of Visible Air Contaminants*. This regulation was rescinded on May 30, 2000, and is therefore not included in this operating permit. It was replaced by 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, which is included in this permit.

New Source Performance Standards Applicability

No NSPS regulations apply to this installation.

Maximum Available Control Technology Applicability

No MACT regulations apply to this installation.

National Emission Standards for Hazardous Air Pollutants Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, *Asbestos Abatement*, 643.225 through 643.250; 10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*, Subpart M, *National Standards for Asbestos*; and 10 CSR 10-6.250, *Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements* apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Other Regulatory Determinations

None.


Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:


Cheryl Steffan
Environmental Engineer
